

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY T. ROMAN,

Defendant.

Case No. 21-MJ-00137-WBG

MOTION FOR DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of defendant Gregory T. Roman and states the following in support of the motion:

1. This motion is being made at the defendant's first appearance before a judicial officer. A Criminal Complaint has been filed charging the defendant with two counts of Cyberstalking, in violation of 18 U.S.C. § 2261A(2).

2. This case involves threats by the defendant placing multiple victims in reasonable fear of death or serious bodily injury, and that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress.

3. The judicial officer shall hold a hearing to determine whether any condition or combination of conditions will reasonably assure the appearance of the defendant as required and the safety of any other person and the community...upon motion of the attorney for the Government or upon the judicial officer's own motion, in a case that involves: a serious risk that the defendant will flee, or a serious risk that the defendant will obstruct or attempt to obstruct

justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror. *See* 18 U.S.C § 3142(f)(2).

4. The United States submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court and the safety of any other person and the community considering: (1) the nature and circumstances of the offense; (2) the weight of the evidence; (3) the history and characteristics of the defendant; and (4) the danger to any person or the community that would be posed by the defendant's release. *See* 18 U.S.C § 3142(f)(2). Because of this, the United States requests that a detention hearing be held and that the defendant be detained.

WHEREFORE, based on the foregoing, the United States requests that the Court hold a detention hearing in accordance with 18 U.S.C. § 3142(f)(2), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Teresa Moore
Acting United States Attorney

By /s/David Luna

David Luna
Assistant United States Attorney
Special Victims Unit
Charles Evans Whittaker Courthouse
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on December 28, 2021, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri, and a copy of the foregoing will be hand-delivered to the defendant at his first appearance before a judicial officer.

/s/ David Luna
David Luna
Assistant United States Attorney